

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DUCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO AUSPL WITNESS MARIO PRINCIPE  
(October 21, 2009)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the  
United States Postal Service hereby directs the following interrogatories and requests  
for the production of documents to Association of United States Postal Lessors witness  
Mario Principe (AUSPL-T-1):

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

\_\_\_\_\_  
Michael T. Tidwell  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
[michael.t.tidwell@usps.gov](mailto:michael.t.tidwell@usps.gov)

**USPS/AUSPL-T1-1**

Please refer to page 5, lines 43-45 of your testimony, as well as USPS Library Reference N2009-1/4 (as revised October 9, 2009).

- (a) Please list and describe the various postal operations referenced on page 5, line 45 of your testimony.
- (b) Please explain the basis for and provide documentation supporting the estimate at lines 44-45 of page 5 that AUSPL members lease 40 percent of the space utilized by the Postal Service to house these various operations.
- (c) Please identify which of the postal facilities listed in USPS Library Reference N2009-1/4 are leased to the Postal Service by members of AUSPL.
- (d) Please indicate the number of properties leased to the Postal Service by the ten AUSPL members with the highest number of such leaseholds.

**USPS/AUSPL-T1-2**

Please refer to page 7, lines 11-13 of your testimony. Has AUSPL conducted any member or public survey, research or poll that serves as the basis for this statement in your testimony? If so, please provide all documents describing the methodology and results of that undertaking. If not, please describe the basis for the statement.

**USPS/AUSPL-T1-3**

Please refer to the definitions provided in your testimony at page 8, lines 4-5. Please provide citations to any publications in which these definitions may be found.

**USPS/AUSPL-T1-4**

Please refer to page 9, lines 22-23 of your testimony. Please list and describe each of the “non-postal needs” of the community to which you refer.

### **USPS/AUSPL-T1-5**

Please refer to your testimony at page 9, lines 27-32 and to the testimony of Postal Service witness Kimberly Matalik at Tr. Vol. 2, page 525, lines 5-16.

- (a) Is it your belief that witness Matalik testified there that the Postal Service gives no consideration at all to customer input in the discontinuance review process? If so, please explain the basis for your belief.
- (b) If your response to subpart (a) above is anything other than an unqualified negative (“no”), would you agree, based on a review of Tr. Vol. 2, page 525, lines 5-16, that Matalik testified to the effect that, as part of its qualitative judgment regarding the consolidation of a station or branch, the Postal Service assigns no specific quantitative weighting to the various factors it considers, including customer input? If not, please explain.

### **USPS/AUSPL-T1-6**

Please refer to page 11, lines 5 through 12 of your testimony.

- (a) Please review USPS-T-2 (as amended on September 16, 2009) and confirm that the number “95” on page 11, line 5 of your testimony should be revised to read “21.” If you cannot confirm, please explain.
- (b) During your review of Post Office closure proposals as a postal employee, do you recall ever being aware that there were discontinuance proposals that were formulated and examined at the local or district level but:
  - (i) that never advanced to the regional/area office for review or to headquarters for a final agency review and decision?
  - (ii) that advanced to the regional/area office for consideration but did not advance to headquarters for a final agency review and decision?